

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

NEW YORK, NY

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES

MUMBAI, INDIA

DIRECT LINE: (202) 342-8614

EMAIL: dsmith@kelleydrye.com

March 26, 2009

VIA ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: Annual Customer Proprietary Network Information Compliance
Certification; EB Docket No. 06-36

Dear Secretary Dortch:

Attached please find the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification for Singapore Telecom USA, Inc. ("Singapore Telecom" or the "Company"). Singapore Telecom, by its attorneys, hereby requests that the Federal Communications Commission ("Commission") waive¹ the March 1, 2009 filing deadline established in 47 C.F.R. § 64.2009(e), and accept the attached CPNI Certification as timely-filed.

¹ The Commission has granted similar waivers of filing deadlines in the past. *See, e.g., In re Universal Service High-Cost Filing Deadlines; Federal-State Joint Board on Universal Service; Advanced Communications technology, Inc. (SAC 519004) – Form 525 Filing Appeal; Allo Communications Petition for Waiver of Filing Deadline; Aventure Communication Technology, LLC Petition for Waiver of Sections 54.307(c) and 54.802 of the Commission's Rules; CC Cellular Study Area Code 559002 Petition for Waiver of Section 54.307(c)(4) Line Count Certification for CETC Universal Service Funding; PrarieWave Black Hills, LLC Petition for Waiver of Section 54.802(a) of the Commission's Rules; Texas RSA 1 Limited Partnership dba XIT Wireless Petition for Waiver of the Section 54.307(c)(1) Applicable to the Line Count Submission Applicable to Interstate Common Line Support*, 23 FCC Rcd 15325 (Oct. 22, 2008); *In re Federal-State Joint Board on universal Service; Universal Service Contribution Methodology; Aventure Communications Technology, LLC, Form 499 Filer ID: 825749 Request for Waiver of USAC Rejection Letter and Request for Waiver of USAC 45 Day Revision Deadline*, 23 FCC Rcd 10096 (June 26, 2008).

Marlene S. Dortch

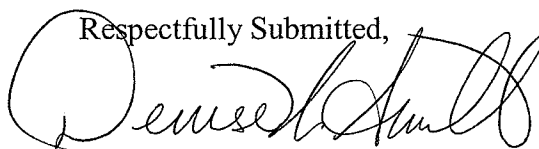
March 26, 2009

Page Two

Due to an inadvertent oversight, Singapore Telecom did not submit a compliance certificate in EB Docket 06-36 on or before March 1, 2009. The Company recently underwent a reorganization of its Finance Department and the CPNI certification filing deadline was inadvertently missed during the transition period. Singapore Telecom understands the sensitive nature of CPNI and takes measures to protect this information. There has not been any breach of CPNI rules, and none of Singapore Telecom's customers have been harmed or prejudiced in any way by the late filing of the Company's CPNI Certification. The Company has always timely-filed its CPNI Certification in the past and assures the Commission that it will take measures to prevent a repeat of the error.

Please contact the undersigned if you have any questions regarding this filing.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Denise N. Smith", written over a circular stamp or seal.

Denise N. Smith

Counsel for Singapore Telecom USA, Inc.

Attachment

Singapore Telecom USA Inc.
Form 499 Filer ID: 821224

Customer Proprietary Network Information Certification

I, Jung Hui Tan, Managing Director of Singapore Telecom USA, Inc. has firsthand knowledge of the procedures that Singapore Telecom USA, Inc. has implemented to comply with the Federal Communications Commission's rules pertaining to safeguarding customer proprietary network information ("CPNI").

I certify that Singapore Telecom USA, Inc. has established procedures that are adequate to comply with the Commission's CPNI rules set forth in Section 64.2001 et seq. I rely on Attachment A in making this certification.

I also certify that Singapore Telecom USA, Inc. did not take any action against data brokers and did not receive any customer complaints in the past year concerning the unauthorized release of CPNI.



Tan Jung Hui
Managing Director
Singapore Telecom USA, Inc.

3/23/09

Date

Customer Proprietary Network Information Certification
Attachment A

Singapore Telecom USA, Inc. has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules pertaining to the use, disclosure and access to customer proprietary network information ("CPNI") set forth in Section 64.2001 et seq. Singapore Telecom USA, Inc. has trained its personnel in the appropriate use of CPNI. Singapore Telecom USA, Inc.'s handbook summarizes the appropriate use of CPNI and has a disciplinary process in place for failure to use CPNI in accordance with Singapore Telecom USA, Inc.'s policy.

In accordance with Singapore Telecom USA, Inc.'s policy, Singapore Telecom USA, Inc. does not use CPNI for any marketing purpose other than to market services to customers within the same category of service to which they already subscribe. For example, Singapore Telecom USA, Inc. may contact the customer regarding extending the length of the customer's contract with Singapore Telecom USA, Inc. Singapore Telecom USA, Inc. may also use CPNI as required to render services and to bill for such services. Singapore Telecom USA, Inc. does not share CPNI with affiliates or third parties.